

BRUCE M. LANDON
Department of Justice
Environment & Natural Resources Division
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Attorney for Federal Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SETTLEMENT AGREEMENT

The State of Alaska, the United States and Doyon, Limited, enter the following settlement agreement:

1. Within 30 days after the effective date of this Settlement Agreement, the parties will execute and file the Joint Motion for Approval of Settlement, Confirmation of Disclaimer, and Entry of Consent Decree and Final Judgment, and Proposed Consent Decree, and Proposed Final Judgment attached hereto and incorporated by reference.
2. All parties shall bear their own costs and attorney fees.

3. This Settlement Agreement shall become effective when all of the signatures required below have been obtained.
4. This settlement agreement shall not be interpreted to require the expenditure of funds not appropriated by Congress.
5. This settlement agreement is entered into for the sole purpose of settling the claims in this action and shall become a part of the record in this action. This settlement agreement shall not be evidence of any agreement by any party to any allegations raised by any other party in this case, or a waiver by, or an admission against any party.
6. This settlement agreement does not constitute an admission of liability and will not prejudice or otherwise affect the rights of any of the parties with respect to any other litigation or factual situation except as expressly provided herein.
7. In the event the consent decree and final judgment specified in Paragraph 1 are not approved by the court, this settlement agreement is void.
8. This settlement agreement shall be binding on the parties, their officers, agents, successors and assigns.

Dated: January 8th, 2007

S/ Elizabeth J. Barry
ELIZABETH J. BARRY
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Dated: January 8th, 2007

S/ Bruce M. Landon
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Dated: January 8th, 2007

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